

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	Criminal No. 14-274 (MAS)
v.	<u>Filed Electronically</u>
MARIJAN CVJETICANIN	<u>EXHIBIT A</u>
Defendants.	Certification of Counsel concerning objection to both Authenticity and Chain of Possession of government's Exhibits

Thomas Ambrosio, of full age, certifies that:

1. I am an attorney at law of the State of New Jersey and have been appointed by the Court, pursuant to the Criminal Justice Act, to represent MARIJAN CVJETICANIN in the above captioned matter and as such I am fully familiar with the facts related to this case.
2. I make this certification in support of defendant's objection to Authenticity of Exhibits which the government intends to introduce into evidence at her trial.
3. I further make this certification in support of defendant's objection to Chain of Possession of Exhibits which the government intends to introduce into evidence at his trial.
4. The government has provided the undersigned with thousands of pages of exhibits related to this case.
5. The exhibits provided up until this point in time are in both electronic format and paper format.
6. The exhibits are a mixture of many types of documents.

7. The undersigned has not yet been able to personally review each and every page of exhibit thus far disclosed by the government.
8. Defendant has never seen and has no knowledge concerning the overwhelming majority of exhibits provided in discovery.
12. Defendant has no way of knowing if the exhibits are authentic and if the exhibits were actually seized from coconspirators.
13. It would be unfair to require defendant to blindly concede to the authenticity and chain of possession of thousands of pages of exhibits that she has never before seen.
14. Additionally, in contesting both the authenticity and chain of possession of exhibits at trial the defendant maintains that a reasonable doubt will be created as to his involvement in the alleged mail fraud.
15. The objection to authenticity and chain of possession of all exhibits is made in good faith by the undersigned.

I certify that the foregoing statements made by me are true and that if any of the statements are willfully false, I am subject to punishment.

Dated: May 8, 2015

/s/Thomas Ambrosio

Thomas Ambrosio